

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

UNITED STATES OF AMERICA

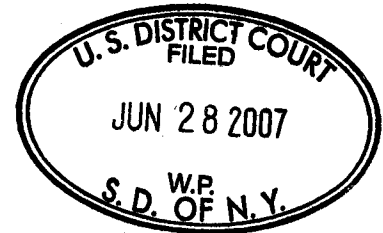
- v. -

GERMAN CUADRADO,
a/k/a "Geraldo,"
JORGE FLORES,
PLUTARCO ANGULO-AGUIRRE,
a/k/a "Matatan,"
a/k/a "Platano,"
RAFAEL RODRIGUEZ,
a/k/a "Dance,"
ANGEL DIAZ,
a/k/a "Pete,"
VICTOR DIAZ,
a/k/a "Gago," and
JUAN CAMACHO,

Defendants.

SEALED
SUPERSEDING
INDICTMENT

S1 07 Cr. 387 (CLB)



COUNT ONE

The Grand Jury charges:

1. On or about September 13, 2006, in the Southern District of New York and elsewhere, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," and VICTOR DIAZ, a/k/a "Gago," the defendants, and others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to violate the laws of the United States.

2. It was a part and an object of the conspiracy that GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," and VICTOR DIAZ, a/k/a "Gago," the defendants, unlawfully, willfully, and knowingly, would and did seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 13, 2006, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," and VICTOR DIAZ, a/k/a "Gago," went to the vicinity of a warehouse in Blauvelt, New York.

(Title 18, United States Code, Section 1201(c).)

COUNT TWO

The Grand Jury further charges:

4. On or about September 13, 2006, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance,"

ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," the defendants, and others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, to wit, the defendants forced two individuals into the sleeping compartment of their truck in Blauvelt, New York, and drove them to New Jersey.

(Title 18, United States Code, Section 1201(a(1)) and 2.)

COUNT THREE

The Grand Jury further charges:

5. In or about September 2006, in the Southern District of New York and elsewhere, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," and JUAN CAMACHO, the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, conspired to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, armed robbery of two truck drivers, in Blauvelt, New York, of a truckload of perfume, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that

term is defined in Title 18, United States Code, Section 1951(b) (3) .

(Title 18, United States Code, Section 1951(a) .)

COUNT FOUR

The Grand Jury further charges:

6. On or about September 13, 2006, in the Southern District of New York and elsewhere, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," and JUAN CAMACHO, the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b) (1), to wit, armed robbery of two truck drivers, in Blauvelt, New York, of a truckload of perfume, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b) (3) .

(Title 18, United States Code, Section 1951(a) and 2.)


COUNT FIVE


The Grand Jury further charges:

7. On or about September 13, 2006, in the Southern District of New York and elsewhere, RAFAEL RODRIGUEZ, a/k/a "Dance," and ANGEL DIAZ, a/k/a "Pete," the defendants, unlawfully, willfully, and knowingly used and carried firearms,

during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the violations of Title 18, United States Code, Sections 1201 and 1951 as charged in Counts One through Four of this Indictment, and possessed firearms in furtherance of such crimes, which firearms were brandished, to wit, the defendants brandished firearms while subduing two truck drivers, transporting them over state lines, and robbing them of the contents of their truck.

(Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

United States District Court

SOUTHERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA

vs.

**GERMAN CUADRADO,
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JORGE FLORES,
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VICTOR DIAZ
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JUAN CAMACHO,**

Defendants.

INDICTMENT

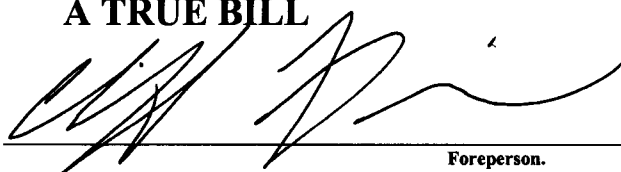
S1 07 Cr. 387 (CLB)

**(In Violation of Title 18, United States Code, Section 1201(c);
Title 18, United States Code, Section 1201(a)(1);
Title 18, United States Code, Section 1951(a);
Title 18, United States Code, Section 924(c)(1)(A)(ii);
Title 18, United States Code, Section 2.)**

MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL



Foreperson.

*Tape
Superseding Indictment filed
Garcia
June 28, 07*